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November 17, 2004

**Via Hand Delivery**

Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re In Re Citizens Telecommunications Company of Tennessee, LLC's d/b/a  
Frontier Communications of Tennessee  
Docket No. ~~03-0021~~ 03-00211

Dear Chairman Tate

Enclosed for filing in the above-referenced proceeding are an original and fourteen copies of Citizens Telecommunications Company of Tennessee L L C.'s ("Citizens") First Set of Discovery on Intervenor

Should you have any questions, please do not hesitate to call

Very truly yours,

STOKES BARTHOLOMEW  
EVANS & PETREE P A



Charles W. Cook, III

CWC/eu  
Enclosures

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**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>CITIZENS TELECOMMUNICATIONS</b>	)	
<b>COMPANY OF TENNESSEE, LLC,</b>	)	
<b>d/b/a FRONTIER COMMUNICATIONS</b>	)	<b>Docket No. 03-0021</b>
<b>OF TENNESSEE,</b>	)	
	)	
<b>Petitioner.</b>	)	

**CITIZENS TELECOMMUNICATIONS COMPANY OF  
TENNESSEE, LLC’S FIRST SET OF DISCOVERY ON  
INTERVENOR BEN LOMAND COMMUNICATIONS, INC.**

Pursuant to TRA Rule 1220-1-2- 11, Citizens Telecommunications Company of Tennessee, LLC (“Citizens”) is issuing these discovery requests to intervener Ben Lomand Communications, Inc (“BLC”)

(a) If any response required by way of answer to these requests is considered to contain confidential or protected information, please furnish this information subject to the protective agreement executed by the parties in this docket

(b) If any response required by way of answer to these requests is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion.

(c) These requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you

(d) If any request cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully If you object to any part of a request,

answer all parts of the request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection

(e) These requests require supplemental responses consistent with the provisions of the Tennessee Rules of Civil Procedure

## **DEFINITIONS**

(a) “You” and “your” means BLC, and any affiliated company providing telecommunications service in the State of Tennessee unless otherwise specified

(b) “And” and “or” shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope

(c) “Identification” or “identify” when used in reference to (i) a natural individual, requires you to state his or her full name and residential and business address, (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the number of pages and the nature of the document (e g , a letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location or custodian, (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication

(d) “Switch” means a device composed of hardware and/or software that establishes, manages and releases physical or virtual connections between two or more points in a voice or data transmission system, regardless of the technology employed (e.g., circuit, wireless, packet, or IP telephony). A “switch” may also perform other functions that enhance the aforementioned connections by providing additional information to or about the parties or devices that are involved in the connections.

### **DISCOVERY REQUESTS**

1 List all products and services BLC offers in Frontier's McMinnville exchange and the associated rates charged end users

#### **RESPONSE:**

2 List all products and services BLC offers in Frontier's Sparta exchange and the associated rates charged end users

#### **RESPONSE:**

3 Have cost studies been prepared to support the rates charged end users for each service? If not, what was the basis for setting each rate

#### **RESPONSE:**

4        Indicate the number of year-end access lines served (YTD for 2004), broken down by business and residence class of service, in Frontier's McMinnville exchange since 1998

**RESPONSE:**

5        Indicate the number of year-end access lines served (YTD for 2004), broken down by business and residence class of service, in Frontier's Sparta exchange since 1998

**RESPONSE:**

6.       For each product and/or service identified in response to request nos 1 and 2 identify pricing discrepancies for products and/or services offered by BLC as compared with such prices and/or services offered by Ben Lomand Rural Telephone Cooperative, Inc

**RESPONSE:**

Respectfully submitted,



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Attorneys for Citizens Telecommunications  
Company of Tennessee, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by facsimile transmission and by hand-delivery on this the 17<sup>th</sup> day of November, 2004 to:

Don Baltimore  
Farrar & Bates LLP  
211 Seventh Avenue North  
Nashville, Tennessee 37219

Richard Collier  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238



Charles W Cook, III